

Before the  
Federal Communications Commission  
Washington, D.C. 20554

Accepted/Filed

JUN - 9 2014

FCC Office of the Secretary

In the Matter of

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Custer, Michigan)

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)  
)  
)  
)  
)

MB Docket No. 14-66  
RM-11689

To: Marlene Dortch, Secretary  
Federal Communications Commission  
Attn: Audio Division, Media Bureau

**COMMENTS ON PROPOSED FOR RULE MAKING**

Pursuant to Section 1.415 of the Rules, these Comments are filed in support of the of the Notice of Proposed Rule Making, MB Docket No. 14-66, RM-11689, submitted by Roy E. Henderson ("Petitioner").

Petitioner reiterates its interest in this Rule Making proceeding as its adoption will allow for the upgrade of Petitioner's Radio Station WCUZ (FM), Bear Lake, Michigan ("WCUZ"). As previously show in the Petition for Rule Making ("Petition") and as again demonstrated in the attached Engineering Comments of Clifton G. Moor, approval of this Petition will result in a significant gain in potential listeners. Specifically, if the Petition is adopted, a greater number of listeners will be able to receive service on Channel 264C3 (37,737) then on Channel 261A (16,325); an increase of almost fifty (50) percent<sup>1</sup>.

<sup>1</sup> See 2012 Census for the United States

Accordingly, Petitioner respectfully urges the Commission to adopt the changes proposed in the Petition, as it is *clearly* in the public interest.

Respectfully submitted,

ROY E. HENDERSON

By: 

John C. Trent, Esquire  
His Counsel

June 9, 2014

*Putbrese Hunsaker & Trent, P.C.*  
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## Comments to MB No. 14-66

Custer, MI

June 2014

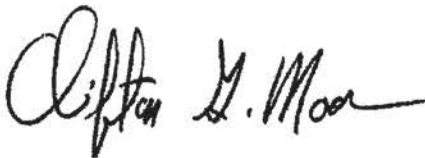
These Technical Comments are filed on behalf of Roy E. Henderson ("Henderson"), proponent of MB Docket No. 14-66 to substitute Channel 260A for 263A at Custer MI. This is a vacant allotment that has yet to go to auction.

A quick technical check proves that the allocation site of 43 58 16 NL and 86 19 42 WL remains fully spaced for Channel 260A. The 70 dBu city grade contour continues to serve all of Custer, MI.

WUGN, Midland, MI is now licensed as a Class C0 facility to more accurately match the "as built" WUGN facility.

In conclusion, Henderson energetically supports the Custer, MI substitution of Channel 260A for Channel 263A. This, along with the WUGN Class C0 downgrade, will allow WCUZ, Bear Lake, MI to increase from Class A (on 261A) to a Class C3 (on 264C3). With this upgrade, Bear Lake's 60 dBu population count will extend from 16,325 persons to 37,737 persons.

All information contained herein is sworn to be accurate to the knowledge or belief of the undersigned:



Clifton G. Moor  
Technical Consultant to  
Roy E. Henderson

June 6, 2014